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Attorneys for The Huntington National Bank

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In Re:

CHRISTOPHER JAMES IVESTER,

Debtor.

Bankruptcy No. 25-20424

Chapter 13

Judge: Kevin R. Anderson

[Filed Electronically]

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY
AND NOTICE OF OPPORTUNITY FOR HEARING**

(Objection Deadline: **May 22, 2025**)

PLEASE TAKE NOTICE that The Huntington National Bank ("Creditor"), has filed with the United States Bankruptcy Court for the District of Utah, a Motion for Relief from the Automatic Stay ("Motion").

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Creditor is requesting that the Court enter an Order terminating the automatic stay pursuant by 11 U.S.C. § 362, including the taking of any necessary steps to protect or preserve the Property, as allowed under the terms of the Agreement and applicable Utah law.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the Court to grant the relief requested in the Motion then you or your attorney must:

1. On or before **May 22, 2025**, file with the Bankruptcy Court a written Objection to the Motion, explaining your position, at:

United States Bankruptcy Court
350 South Main Street, Room 341
Salt Lake City, Utah 84101

If you mail your objection to the Bankruptcy Court for filing you must mail it early enough so that the Court will **receive** it on or before **May 22, 2025**. You must also mail a copy to the undersigned counsel at:

Kenyon D. Dove
Smith Knowles, PLLC
2225 Washington Boulevard, Suite 200
Ogden, Utah 84401

2. Attend a hearing on **June 2, 2025 at 1:30 pm.** This hearing will be held online by Zoom. Parties should log in to Zoom at www.zoomgov.com/join at least ten (10) minutes before the scheduled time for the hearing. Meeting ID and Passcode are as follows:

Judge Kevin R. Anderson

Meeting ID: 160 3007 6397; Passcode: 6001201

Parties who wish to participate in the hearing should consult the Bankruptcy Court's website at <https://www.utb.uscourts.gov/court-hearings-be-conducted-zoom> for the most up-to-date information. **There will be no further notice of the hearing** and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Bankruptcy Court may decide that you do not oppose the relief sought in the Motion for Relief from the Automatic Stay and may enter an order granting that relief. In the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an Order approving the Motion for Relief from the Automatic Stay without hearing.

DATED this 5th day of May, 2025.

SMITH KNOWLES, PLLC

/s/ Kenyon D. Dove
Attorney at Law

CERTIFICATE OF SERVICE
BY NOTICE OF ELECTRONIC FILING (CM/ECF)

I hereby certify that on the 5th day of May, 2025, I electronically filed the foregoing, **NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY, AND NOTICE OF OPPORTUNITY FOR HEARING**, with the United States Bankruptcy Court for the District of Utah by using the CM/ECF system. I further certify that the parties of record in this case, as identified below, are registered CM/ECF users and will be served through the CM/ECF system:

- **Darwin H. Bingham** dbingham@scalleyreading.net, cat@scalleyreading.net
- **Justin O. Burton** justin@rulontburton.com, jeannie@rulontburton.com
- **P. Matthew Cox** mcox@spencerfane.com, ecall@spencerfane.com;mwatson@spencerfane.com
- **Kenyon D. Dove** defaultservices@smithknowles.com
- **L. Mark Ferre** mferre1974@gmail.com
- **Lon Jenkins tr** ecfmail@ch13ut.org, lneebling@ch13ut.org
- **United States Trustee** USTPRegion19.SK.ECF@usdoj.gov
- **Aaron M. Waite** aaronmwaite@agutah.gov

CERTIFICATE OF SERVICE
BY MAIL, OTHER

I hereby certify that on the 5th day of May, 2025, I caused to be served a true and correct copy of the foregoing, **NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY, AND NOTICE OF OPPORTUNITY FOR HEARING**, as follows:

Mail Service – By regular first-class United States mail, postage fully pre-paid, addressed to:

Debtor

Christopher James Ivester
HC 65 Box 215
Duchesne, UT 84021

/s/ Kenyon D. Dove

Attorney at Law